

1 Bob L. Olson, Esq.  
2 Nevada Bar No. 3783  
3 Charles E. Gianelloni, Esq.  
4 Nevada Bar No. 12747  
5 V.R. Bohman, Esq.  
6 Nevada Bar No. 13075  
7 SNELL & WILMER L.L.P.  
8 3883 Howard Hughes Parkway, Suite 1100  
9 Las Vegas, NV 89169  
Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
Email: bolson@swlaw.com  
cgianelloni@swlaw.com  
vbohman@swlaw.com

10  
11 *Attorneys for Defendant*  
12 *Experian Information Solutions, Inc.*

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15 JODI J. JONES,  
16 Plaintiff,  
17 v.

18 BANK OF THE WEST, IDAHO CENTRAL  
19 CREDIT UNION, ONEWEST BANK, and  
20 EXPERIAN INFORMATION SOLUTIONS,  
21 INC.,

22 Defendants.

23 Case No. 2:15-cv-01930-APG-NJK

24 STIPULATED PROTECTIVE ORDER

25 Complaint filed: October 7, 2015

26 AS AMENDED

27 IT IS HEREBY STIPULATED by and between Plaintiff Jodi J. Jones ("Plaintiff") and  
28 Defendant Experian Information Solutions, Inc. ("Experian"), through their respective attorneys  
of record, as follows:

29 WHEREAS, documents and information have been and may be sought, produced or  
30 exhibited by and among the parties to this action relating to trade secrets, confidential research,  
31 development, technology or other proprietary information belonging to the defendants, and/or  
32 personal income, credit and other confidential information of Plaintiff.

33 THEREFORE, an Order of this Court protecting such confidential information shall be  
34 and hereby is made by this Court on the following terms:

1       1. This Order shall govern the use, handling and disclosure of all documents,  
 2 testimony or information produced or given in this action which are designated to be subject to  
 3 this Order in accordance with the terms hereof.

4       2. Any party or non-party producing or filing documents or other materials in this  
 5 action may designate such materials and the information contained therein subject to this Order  
 6 by typing or stamping on the front of the document, or on the portion(s) of the document for  
 7 which confidential treatment is designated, "Confidential."

8       3. To the extent any motions, briefs, pleadings, deposition transcripts, or other papers  
 9 to be filed with the Court incorporate documents or information subject to this Order, the party  
 See order issued  
 concurrently herewith shall designate such materials, or portions thereof, as "Confidential," and shall

10       ----- file under seal; provided, however, that a copy of such filing having the  
 11 confidential information deleted therefrom may be made part of the public record. Any party  
 12 filing any document under seal must comply with the requirements of Civil Local Rule IA 10-5.

13       4. All documents, transcripts, or other materials subject to this Order, and all  
 14 information derived therefrom (including, but not limited to, all testimony given in a deposition,  
 15 declaration or otherwise, that refers, reflects or otherwise discusses any information designated  
 16 "Confidential," shall not be used, directly or indirectly, by any person, including the other  
 17 defendants, for any business, commercial or competitive purposes or for any purpose whatsoever  
 18 other than solely for the preparation and trial of this action in accordance with the provisions of  
 19 this Order.

20       5. Except with the prior written consent of the individual or entity designating a  
 21 document or portions of a document as "Confidential," or pursuant to prior Order after notice, any  
 22 document, transcript or pleading given "Confidential" treatment under this Order, and any  
 23 information contained in, or derived from any such materials (including but not limited to, all  
 24 deposition testimony that refers to, reflects or otherwise discusses any information designated  
 25 "Confidential" hereunder) may not be disclosed other than in accordance with this Order and may  
 26 not be disclosed to any person other than: (a) the Court and its officers; (b) parties to this  
 27 litigation; (c) counsel for the parties, whether retained outside counsel or in-house counsel and

1 employees of counsel assigned to assist such counsel in the preparation of this litigation; (d) fact  
 2 witnesses subject to a proffer to the Court or a stipulation of the parties that such witnesses need  
 3 to know such information; (e) present or former employees of the Producing Party in connection  
 4 with their depositions in this action (provided that no former employees shall be shown  
 5 documents prepared after the date of his or her departure); and (f) experts specifically retained as  
 6 consultants or expert witnesses in connection with this litigation.

7       6. Documents produced pursuant to this Order shall not be made available to any  
 8 person designated in Subparagraph 5(f) unless he or she shall have first read this Order, agreed to  
 9 be bound by its terms, and signed the attached Declaration of Compliance.

10     7. All persons receiving any or all documents produced pursuant to this Order shall  
 11 be advised of their confidential nature. All persons to whom confidential information and/or  
 12 documents are disclosed are hereby enjoined from disclosing same to any person except as  
 13 provided herein, and are further enjoined from using same except in the preparation for and trial  
 14 of the above-captioned action between the named parties thereto. No person receiving or  
 15 reviewing such confidential documents, information or transcript shall disseminate or disclose  
 16 them to any person other than those described above in Paragraph 5 and for the purposes  
 17 specified, and in no event shall such person make any other use of such document or transcript.

18     8. Nothing in this Order shall prevent a party from using at trial any information or  
 19 materials designated "Confidential."

20     9. This Order has been agreed to by the parties to facilitate discovery and the  
 21 production of relevant evidence in this action. Neither the entry of this Order, nor the designation  
 22 of any information, document, or the like as "Confidential," nor the failure to make such  
 23 designation, shall constitute evidence with respect to any issue in this action.

24     10. Within sixty (60) days after the final termination of this litigation, all documents,  
 25 transcripts, or other materials afforded confidential treatment pursuant to this Order, including  
 26 any extracts, summaries or compilations taken therefrom, but excluding any materials which in  
 27 the good faith judgment of counsel are work product materials, shall be returned to the Producing  
 28 Party.

1       11. In the event that any party to this litigation disagrees at any point in these  
2 proceedings with any designation made under this Protective Order, the parties shall first try to  
3 resolve such dispute in good faith on an informal basis in accordance with Civil Local Rule 26-7.  
4 If the dispute cannot be resolved, the party objecting to the designation may seek appropriate  
5 relief from this Court. During the pendency of any challenge to the designation of a document or  
6 information, the designated document or information shall continue to be treated as  
7 "Confidential" subject to the provisions of this Protective Order.

8       12. Nothing herein shall affect or restrict the rights of any party with respect to its own  
9 documents or to the information obtained or developed independently of documents, transcripts  
10 and materials afforded confidential treatment pursuant to this Order.

11

12     ///

13     ///

14     ///

15     ///

16     ///

17     ///

18     ///

19     ///

20     ///

21     ///

22     ///

23     ///

24     ///

25     ///

26     ///

27     ///

28     ///

Snell & Wilmer  
L.L.P.

LAW OFFICES  
Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
702.784.5200

13. The Court retains the right to allow disclosure of any subject covered by this stipulation or to modify this stipulation at any time in the interest of justice.

DATED this 30th day of March 2016.

SNELL & WILMER L.L.P.

By: /s/ Bob L. Olson

---

Bob L. Olson, Esq.

Charles E. Gianelloni, Esq.

V.R. Bohman, Esq.

3883 Howard Hughes Parkway, Suite 1100

Las Vegas, NV 89169

Telephone: (702) 784-5200

Facsimile: (702) 784-5252

*Attorneys for Defendant Experian Information Solutions, Inc.*

KAZEROUNI LAW GROUP

By: /s/ Michael Kind

Michael Kind, Esq.

7854 West Sahara Avenue

Las Vegas, Nevada 89117

Telephone: (800) 400-6808

*Attorneys for Plaintiff Jodi Jones*

## ORDER

IT IS SO ORDERED.

## United States Magistrate Judge

DATED March 31, 2016.

11

11

1 EXHIBIT A

2 DECLARATION OF COMPLIANCE

3 I, \_\_\_\_\_, declare as follows:

4 1. My address is \_\_\_\_\_.

5 2. My present employer is \_\_\_\_\_.

6 3. My present occupation or job description is \_\_\_\_\_.

7 4. I have received a copy of the Stipulated Protective Order entered in this action on  
8 \_\_\_\_\_, 20\_\_\_\_.

9 5. I have carefully read and understand the provisions of this Stipulated Protective  
10 Order.

11 6. I will comply with all provisions of this Stipulated Protective Order.

12 7. I will hold in confidence, and will not disclose to anyone not qualified under the  
13 Stipulated Protective Order, any information, documents or other materials produced subject to  
14 this Stipulated Protective Order.

15 8. I will use such information, documents or other materials produced subject to this  
16 Stipulated Protective Order only for purposes of this present action.

17 9. Upon termination of this action, or upon request, I will return and deliver all  
18 information, documents or other materials produced subject to this Stipulated Protective Order,  
19 and all documents or things which I have prepared relating to the information, documents or other  
20 materials that are subject to the Stipulated Protective Order, to my counsel in this action, or to  
21 counsel for the party by whom I am employed or retained or from whom I received the  
22 documents.

23 10. I hereby submit to the jurisdiction of this Court for the purposes of enforcing the  
24 Stipulated Protective Order in this action.

25 ///

26 ///

27 ///

28 ///

1 I declare under penalty of perjury under the laws of the United States that the following is  
2 true and correct.

3 Executed this \_\_\_\_ day of \_\_\_\_\_, 2016 at \_\_\_\_\_.

4

5 QUALIFIED PERSON

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Snell & Wilmer

L.L.P.  
LAW OFFICES  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
702.784.5200